

## Message

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**Sent:** 2/6/2019 6:56:54 PM  
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**CC:** Neal, Conor [Neal.Conor@epa.gov]; Sundar, Bhooma [sundar.bhooma@epa.gov]  
**Subject:** For discussion purposes - Preliminary Comments on Draft Design-Level Data Soil Investigation Work Plan  
**Attachments:** Draft TCE ISO\_SEWER GAS\_11-19-18.pdf

Hi –

Here are some discussion topics for the soil portion of the call this afternoon:

- 1) The areal extent of the sampling plan does not include the entire area where elevated VOC sewer vapors were reported. Please see the attached IWM figure showing impacted sewer areas (TCE) that correspond to EPA's anticipated areal extent of the interim measure proposal. Refer also to EPA's Dec 11, 2018 letter identifying the requirements for the IM.
- 2) For today's call, it would be helpful to have an overview explaining conceptually the rationale for the sample design.
- 3) What is the assumption behind/rationale for sampling above the sewer line? Two samples above the sewer line seem unnecessary. More intensive sampling below the sewer line would seem to provide more practical information.
- 4) The WP needs additional detail about how you plan to interpolate between sample points. For example, when samples are 100 feet apart horizontally, and the interval between the bottom of Unit B (bottom of boring) and the "third" sample below the sewer. Is the plan to add samples below the "third" sample (one foot below sewer) when the third sample is "hot?" Otherwise, the vertical extent would be unknown for upwards of 15', depending on the depth of the B unit.
- 5) What are the decision criteria for determining whether secondary samples will be taken. Beyond secondary samples, how will step-outs proceed to define the extent of contamination?
- 6) On page 5, what is meant by your use of the term "confirmatory samples?" Generally, that term is used for samples taken following remediation to ensure that the actions have met remedial action objectives.
- 7) What are you thinking about for confirmation sampling techniques to satisfy paragraph 10 of the work plan request?
- 8) Equipment blanks should be collected at a rate of one per sampling media **per day**. Currently, Amphenol is proposing collecting one equipment blank per sampling medium.

Thanks. GW plan comments to follow.

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